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Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$9,100.00 IN
U.S. CURRENCY,

Defendant.

2:20-MC-00095-MCE-EFB

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and potential claimant Stanley Stewart ("claimant"), by and through their respective counsel, as follows:

1. On or about January 21, 2020, claimant filed a claim in the administrative forfeiture proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$9,100.00 in U.S. Currency (hereafter "defendant currency"), which was seized on October 25, 2019.

2. The U.S. Postal Inspection Service has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture within ninety days after a claim has been filed in the administrative

1 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
2 parties. That deadline is April 20, 2020.

3 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to May
4 20, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
5 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
6 forfeiture.

7 5. Accordingly, the parties agree that the deadline by which the United States shall be
8 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
9 alleging that the defendant currency is subject to forfeiture shall be extended to May 20, 2020.

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11 Dated: 4/16/20

McGREGOR W. SCOTT
United States Attorney

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13 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

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16 Dated: 4/16/20

/s/ Samuel D. Berns
SAMUEL D. BERNs
Attorney for potential claimant
Stanley Stewart
(Signature authorized by email)

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20 **IT IS SO ORDERED.**

21 Dated: April 17, 2020

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24 MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE